

Atty. Docket No. 59033-278849
Serial No.: 09/689,222

PATENT

REMARKS

The Applicant respectfully requests reconsideration of this application. No claims have been amended, added, or cancelled.

Claim Rejections – 35 U.S.C. § 103

In the Office action, the Examiner rejected claims 4, 5, 10, 11, 18, 24, 25, 38, and 41-71 under 35 U.S.C. § 103(a) for allegedly being unpatentable over US Patent No. 6,154,465 of Pickett et al. (hereafter "Pickett") in view of Resource Reservation Protocol, RFC2205 of Braden et al. (hereafter "Braden"). The undersigned respectfully disagrees with the Examiner's characterization of Pickett and Braden and points out several distinctions between the claimed subject matter and the teachings of Pickett and Braden.

As presently understood by the undersigned, Pickett relates to systems and methods for transmitting and receiving voice and data in multiple modes, and more particularly to systems and methods for multiple native mode voice and data transmissions and receptions with a communications system having a multi-bus structure. (Pickett Col. 1, Lines 10-14) The undersigned agrees with the Examiner's comment on Page 3 of the Office action that Pickett does not explicitly disclose the capability of serving as reservation aggregation points. In addition, the undersigned believes Pickett does not teach or reasonably suggest at least the following: (1) the use of a media aggregation manager as a reservation protocol session proxy; (2) establishing a device that provides application/protocol specific multiplexing/de-multiplexing of media traffic onto a pre-allocated reservation protocol session; (3) mechanisms for the interactive exploration of changes in path selection that might affect link utilization; (4) substantially simultaneously provisioning a plurality of routers that are part of a selected path; and (5) mechanisms for the interactive illustrations of path prioritization.

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As presently understood by the undersigned, Braden teaches an example of a particular bandwidth reservation protocol, the Resource Reservation Protocol (RSVP). RSVP is an Internet Protocol- (IP) based protocol that allows applications running on end-stations, such as desktop computers, to communicate per-flow requirements by signaling the network. Using RSVP, the initiator of a VoIP call transmits a Path message downstream to the prospective recipient. The Path message causes state information, such as information regarding the reverse path to the initiator, to be stored in each node along the way. Subsequently, the prospective recipient of the VoIP call initiates resource reservation setup by communicating its requirements to an adjacent router via an upstream Resv message. For example, the prospective recipient may communicate a desired quality of service (QoS), e.g., peak/average bandwidth and delay bounds, and a description of the data flow to all intervening routers between the call participants. Additionally, after the reservation has been established, participating routers must continue to exchange periodic status and control messages to maintain the reservation. Consequently, processing and storage overhead associated with reservation establishment and maintenance increases linearly as a function of the number of calls. The undersigned finds no teaching or suggestion in Braden regarding at least the following: (1) the use of a media aggregation manager as a reservation protocol session proxy; (2) establishing a device that provides application/protocol specific multiplexing/de-multiplexing of media traffic onto a pre-allocated reservation protocol session; (3) mechanisms for the interactive exploration of changes in path selection that might affect link utilization; (4) substantially simultaneously provisioning a plurality of routers that are part of a selected path; and (5) mechanisms for the interactive illustrations of path prioritization.

With this brief overview of Pickett and Braden, the undersigned now submits the following arguments point out significant differences between the invention as claimed by the Applicant and the combination of Pickett and Braden.

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Regarding claims 4 and 24, neither Pickett nor Braden teach or reasonably suggest "displaying a first projected link utilization schedule in response to a first request to analyze the effect of conveying media packets between the first user community and the second user community and the second user community over a first path of the plurality of physical paths, the first projected link utilization schedule illustrating predicted bandwidth usage for routers associated with the second path." The Examiner, on page 3 of the Office action, suggests this is taught by Pickett by quoting a portion of Pickett indicating "the D-type signaling channel may have sufficient bandwidth to provide signaling information for a plurality of communication links, with communications systems implemented and/or connected together as described herein, a common D-type signaling channel may be used to efficiently provide signaling information for a plurality of T-1 or similar links coupled to a plurality of such communications systems, etc."

However, Pickett at column 44, line 15-21 states: "D channel used to carry, for example, control signal signals and customer call data such as in a packet switched mode. As is known in the art, a D or similar control signaling channel typically is used to provide appropriate signaling information for the voice or B channels. The D channel typically and preferably carries such control signaling information in the form of a serial data stream." Pickett does not suggest displaying the information. More specifically, Pickett does not teach or suggest the ability to display projected link utilization schedules responsive to requests to analyze the effect of conveying media packets between the first user community and the second user community over a selected path of a plurality of physical paths through which media packets may be exchanged between the first user community and the second user community. Pickett also does not address the concept of a projected link utilization schedule illustrating predicted bandwidth usage for routers associated with the selected path.

The Examiner continues on Page 3 by suggesting that the "displaying of graphical representation of a first and second media aggregation manager" is taught by Pickett's Trace manager. Pickett [0250] indicates "a complete log of all system activity, the trace manager provides useful information such as real-time call progress, WAN protocol traces, frame relay

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management information, and voice mail activity to facilitate troubleshooting.” Pickett continues at [0254] by stating “the trace manager includes the following features and benefits: Display of all system activity; graphically based; enabled on a per-service basis; multiple trace levels; and events and color-coded for readability.” The undersigned respectfully suggests the Examiner is not giving meaning to the defined phrase “media aggregation manager.” On page 12, line 5 of the present application, a “media aggregation manager” is explicitly defined as “a network device, such as an edge device at the ingress/egress of a user community, or a group of one or more software processes running on a network device that provides application/protocol specific multiplexing/de-multiplexing of media traffic onto a pre-allocated reservation protocol session.” Pickett’s trace manager cannot be equated with a media aggregation manager as defined.

The undersigned agrees with the Examiner’s statement on Page 3 of the Office action that Pickett does not explicitly disclose the capability of serving as reservation session aggregation points on behalf of a first user community and a second user community, respectively, the first user community and the second community communicatively couple by a plurality of physical paths through which media packets may be exchanged by the way of one or more packet forwarding devices. The Examiner suggests that the combination of Pickett with Braden would not only teach this idea but would have been obvious to one of ordinary skill in the art at the time the invention was made. Braden, however, does not teach that RSVP should be used in a *single* instance to support a plurality of application sessions among terminals of multiple user communities by multiplexing the application sessions onto the single RSVP session. For at least these reasons, claims 4 and 24 are clearly distinguishable over the combination of Pickett and Braden.

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With regard to claims 5 and 25, the combination of Pickett does not teach or reasonably suggest the overlaying of a selected path of the plurality of physical paths onto existing bandwidth allocations to determine projected link utilization associated with the selected path. Pickett only refers to a visual representation of whether particular ports or resources are in use. [0272] This does not teach the visual representation of *projected* link utilization as claimed. In addition, Pickett does not teach or suggest the overlaying of a *selected* path from the plurality of physical paths that connect the communities. For at least this additional reason, claims 5 and 25 are further distinguishable over Pickett and Braden.

With regard to claim 10, the combination of Pickett and Braden do not teach or reasonably suggest the explicitly recited first and second user interface screens along with the configuration of a set of selected routers. According to claim 10, the second user interface screen allow an end-user to initiate "configuration of a set of routers ... that are part of a selected path ... and ... establishment of the pre-allocated reservation protocol session." The undersigned respectfully refers the Examiner to Figures 5-8 for an example illustration of this configuration method.

With regard to claims 18, 38, and 60, the examiner is respectfully requested to examine Figure 7 as an example illustration of various processing encompassed by these claims. On page 5 of the Office action, the Examiner has suggested that Pickett [0169] teaches these claims. First, the undersigned finds no suggestion or teaching of a media aggregation manager in Pickett. Second, Pickett does not teach or suggest substantially simultaneously provisioning a plurality of routers that are part of a selected path to route media packets exchanged between the first media aggregation manager and the second media aggregation manager over the selected path. For at least these reasons, claims 18, 38, and 60 are further distinguishable over the combination of Pickett and Braden.

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With regard to claims 41, 52, 61, and 71, the combination of Pickett and Braden do not teach or reasonably suggest the notion of a proxy or single RSVP session shared by multiple application sessions. In addition, neither Pickett nor Braden suggest graphically depicting a plurality of paths through the VoIP network each representing a potential path over which media packets are capable of being transferred between the first community and second community. For at least these reasons, claims 41, 52, 61, and 71 are further distinguishable over the combination of Pickett and Braden.

With regard to claims 45 and 65, the undersigned respectfully disagrees with the Examiners response on page 7 of the Office action that suggests that Pickett [0094] teaches these claims. First, Pickett does not teach graphically depicting a plurality of paths. Second, Pickett does not prioritize these paths based on one or more predetermined factors. For at least these reasons, claims 45 and 65 are further distinguishable over the combination of Pickett and Braden.

With regards to claim 54, the undersigned points out that Pickett does not graphically depict the potential paths on the display a prioritized fashion. The Examiner is again respectfully requested to examine Figure 7 which illustrates an example of this functionality. Second, there is no notion of a Reservation Protocol Session proxy in either Pickett or Braden. In addition, claim 54 requires the use of a single reservation protocol session. As presented above, concept is not contemplated by either Pickett or Braden.

Conclusion

Applicant respectfully submits that the rejections have been overcome by the remark and that the pending claims are in condition for allowance. Accordingly, Applicant respectfully requests that the rejections be withdrawn and that a Notice of Allowance be issued for claims 4, 5, 10, 11, 18, 24, 25, 38, and 41-71.

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Invitation for a Telephone Interview

The Examiner is request to call the undersigned at (303) 607-3633 if there remains any issue with allowance of the case.

Date: January 19, 2005

Respectfully submitted,

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